



Postal Regulatory Commission  
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October 18, 2011

Ruth Y. Goldway  
Chairman  
Postal Regulatory Commission  
901 New York Avenue, NW Suite 200  
Washington, DC 20268-0001

**RE: Docket # N2011-1**

Dear Chairman Goldway:

New York Farm Bureau (NYFB), the largest general farm organization in New York State, appreciates the opportunity to provide comment on the United States Postal Service (USPS) request for an advisory opinion from the Postal Regulatory Commission (PRC) regarding its proposed Retail Access Optimization Initiative (RAO). As residents and business owners, our farm family members have a significant interest in any efforts and actions that affect the availability and accessibility of mail services to their rural communities. The RAO has targeted approximately sixty rural New York post offices for closure.

NYFB recognizes that declining postal usage, increasing fuel and other business costs have placed severe financial constraints on the USPS that has forced a reexamination of the scope of their services. We commend the USPS for their intent to operate within their means, as few government entities do. However, our members hold serious concerns over the disruption and disproportionately negative impact retail discontinuance of certain post offices in rural and isolated regions will have on their businesses and daily quality of life.

Our farmer members rely on the postal service for timely delivery and receipt of information and parcels necessary for business transactions, federal and state regulatory compliance, testing of agricultural samples for consumer and environmental safety and other critical functions of the farm industry. Turning to a third-party mail service in the absence of USPS services would place a significant cost on our farm businesses in today's sluggish economy when they can least afford it. Similarly, with the widespread lack of broadband and Internet technologies in many rural communities, farm businesses cannot avail themselves of any online resources to fill the service gap left by a USPS facility closing. NYFB estimates that approximately half of its 28,000 membership are without reliable email or Internet capabilities.

Farmers are competing in a global marketplace in a fiscal environment where every penny is carefully accounted for and margins can be tenuous despite best laid plans. For this reason, any PRC advisory opinion must ensure that postal services are conducted in a manner that is financially responsible and efficient without placing an unreasonable burden on our local farms

and businesses that are already struggling. To that end, Farm Bureau does support elimination of Saturday mail delivery provided that there is a significant economic advantage for the USPS.

For a northern state like New York, post office closures will undoubtedly force rural residents to take up costly and time-consuming commutes to distant postal facilities that can be difficult and dangerous to reach, especially during the winter months. Federal law requires that "the Postal Service shall provide a maximum degree of effective and regular postal services to rural areas, communities, and small towns." (39 U.S.C. 101(b)). With this statutory mandate in mind, we urge the PRC to weigh carefully and give every consideration to the full consequences for our rural communities and farm businesses with each and every closure designation.

Again, thank you for the opportunity to provide comments as the PRC reviews the RAO and renders its advisory opinion. Please feel free to contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Dean E. Norton", followed by a long horizontal flourish.

Dean E. Norton  
President  
New York Farm Bureau